

### **REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed August 17, 2006 ("Office Action"). Claims 1-2, 4-17, 19-32, and 34-37 are pending in the Application. The Examiner rejected Claims 1-2, 4-17, 19-32, and 34-47. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

#### **Section 112 Rejection**

The Examiner rejects Claims 1-2, 4-17, 19-32, and 34-47 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement because the claims contain subject matter not described in the specification. *Office Action*, p. 2. Applicants respectfully submit that the claims as written comply with 35 U.S.C. § 112, first paragraph. For example, the following excerpts provide exemplary support of compliance with the written description requirement for the phrase "operable to authenticate a plurality of requests received from a plurality of customer premise systems": page 12, lines 11-14; page 14, line 13 – page 15, line 13; page 17, lines 11-31. Accordingly, Applicants respectfully request reconsideration of Claims 1-2, 4-17, 19-32, and 34-47.

#### **Section 102 Rejection**

The Examiner rejects Claims 1-2, 4-5, 13-14, 16-17, 19-20, 28-29, 31-32, 34-35, 43-44, and 46 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,963,573 issued to Cain et al. ("*Cain*"). Applicants attach a declaration according to 37 C.F.R. § 1.131 that sets forth facts that clearly establish an actual reduction to practice of at least the independent claims prior to the effective date of *Cain*. Because *Cain* is not available as a reference, Applicants respectfully request reconsideration and allowance of the pending claims.

#### **Section 103 Rejections**

The Examiner rejects Claims 6, 7, 21, 22, 36, and 37 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* as applied to Claims 1, 16, and 31 above, and further in view of U.S. Patent No. 6,219,790 B1 issued to Lloyd et al. ("*Lloyd*"). The Examiner rejects Claims

8, 23, and 38 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* as applied to Claims 1, 16, and 31 above, and further in view of U.S. Patent No. 6, 466,571 B1 issued to Dynarski et al. ("*Dynarski*"). The Examiner rejects Claims 9, 24, and 39 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* as applied to Claims 1, 16, and 31 above, and further in view of U.S. Patent No. 6,718,387 B1 issued to Gupta et al. ("*Gupta*"). The Examiner rejects Claims 10-12, 25-27, and 40-42 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* as applied to Claims 1, 16, and 31 above, and further in view of U.S. Patent No. 6,026,441 issued to Ronen ("*Ronen*"). The Examiner rejects Claims 15, 30, and 45 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* as applied to Claims 1, 16, and 31 above, and further in view of U.S. Patent No. 5,671,225 issued to Hooper et al. ("*Hooper*"). The Examiner rejects Claim 47 under 35 U.S.C. § 103(a) as being unpatentable over *Cain* in view of *Ronen*.

Applicants may overcome a 35 U.S.C. § 103 rejection "by showing completion of the invention . . . prior to the effective date of any of the references." M.P.E.P. § 715.02. The Examiner relies on *Cain* in combination with various combinations of five other references as the basis to reject Applicants' claims under 35 U.S.C. § 103(a). As discussed above, Applicants attach a declaration according to 37 C.F.R. § 1.131 that sets forth facts that clearly establish an actual reduction to practice of at least the independent claims prior to the effective date of *Cain*. Because *Cain* is not available as a reference, Applicants respectfully request reconsideration and allowance of the pending claims.

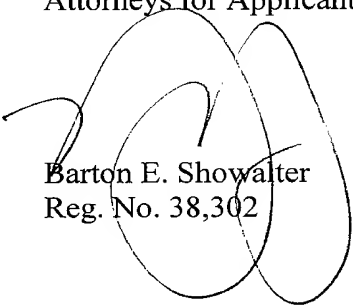
**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons, and for other reasons clear and apparent, Applicants respectfully request reconsideration and allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Barton E. Showalter, Attorney for Applicants, at the Examiner's convenience at (214) 953-6509.

Applicants do not believe any fees are due. However, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,  
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